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June 25, 2024

**VIA ECF**

Hon. Gregory H. Woods  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

USDC SDNY  
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**MEMORANDUM ENDORSED**

Re: *Z.I. et al v. New York City Dep't of Educ.*, 24-cv-1801 (GHW)

Dear Judge Woods,

We represent Defendant in the above-referenced case, wherein Plaintiffs seek attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

We hereby write jointly with Plaintiff's counsel to respectfully request an adjournment, *sine die*, of the Initial Pretrial Conference ("IPTC") scheduled before Your Honor for July 2, 2024. This is the parties' first request for an adjournment of the IPTC. We note that Defendant is finalizing this matter with the intention of commencing settlement negotiations within the next month and do not believe an IPTC is necessary, so as to avoid the utilization of court resources. We note that our firm has settled all of the many similar IDEA fees-only cases brought by plaintiffs represented by the Dayan firm in the recent years and the parties are optimistic this case will follow the same course. We further note that the parties have been in active communications and complied with Your Honor's March 11, 2024, Order ("Order") to meet and confer in a good faith attempt to resolve this matter.

In addition, pursuant to Your Honor's Order, the parties are to (a) submit a joint letter and proposed Case Management Plan ("CMP") by June 25, 2024, and (b) Defendant is to answer the Complaint on the date of the IPTC. In light of the requested adjournment of the IPTC for settlement purposes, we respectfully request a corresponding adjournment *sine die* of the joint letter and CMP and Defendant requests a final extension of time to answer the Complaint. The parties apologize for the lateness of this request to adjourn the CMP (not having complied with Your Honor's two business day rule) and inconvenience to the Court.

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Accordingly, the parties propose that the CMP and IPTC be adjourned *sine die* and that the Court extend Defendant's time to answer the Complaint to August 2, 2024. Thank you for considering these requests.

Respectfully Submitted,

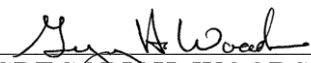
By: /s/ Vivian Rivera Drohan  
Vivian Rivera Drohan

cc: Adam Dayan, (via ECF)

Application granted in part. The parties' request to adjourn the initial pretrial conference and extend Defendant's time to answer or otherwise respond to the complaint, Dkt. No. 9, is granted in part. The initial pretrial conference scheduled for July 2, 2024 is adjourned to September 3, 2024 at 3:00 p.m. The joint status letter and proposed case management plan described in the Court's March 11, 2024 order, Dkt. No. 6, are due no later than August 26, 2024. Defendant's time to answer or otherwise respond to the complaint is extended to August 2, 2024. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 9.

SO ORDERED.

Dated: June 26, 2024  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge